

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

MICHAEL WOODLEY OF MENIE,
Plaintiff,

v.

RATIONALWIKI FOUNDATION, INC.
d/b/a RATIONALMEDIA FOUNDATION,
TRENT TOULOUSE, LARRY WILL and
JOHN DOES 1-2,
Defendants.

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CIVIL ACTION No. 1:25-cv-296

JURY DEMANDED

VERIFIED COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, MICHAEL WOODLEY of MENIE, Ph.D., by and through undersigned Counsel, Aaron T. Cress, Esq. (LATE NIGHT LAW, LLC), and hereby respectfully complains and shows as follows.

PARTIES, JURISDICTION & VENUE

1. Plaintiff Michael Woodley of Menie is a citizen of the United Kingdom.
2. Defendant RationalWiki Foundation, Inc. d/b/a RationalMedia Foundation, is a New Mexico domestic nonprofit corporation and 501(c)(3), EIN 27-3197280, with its principal place of business located in New Mexico, at 122 Girard Ave NE Albuquerque, NM 87106.
3. Defendant Trent Toulouse is a U.S. citizen and resident of Albuquerque, New Mexico and a Board Trustee of Defendant RationalWiki Foundation, Inc.
4. Defendant Larry Will is a U.S. citizen and resident of Mount Airy, Maryland and a Board Trustee of Defendant RationalWiki Foundation, Inc., who goes by the online pseudonym “Cosmikdebris.”

5. Defendant John Doe 1 is a U.S. citizen and resident of Kansas, and a Board Trustee of Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “DuceMoosolini.”

6. Defendant John Doe 2 is a U.S. citizen, and an editor of a website published by Defendant RationalWiki Foundation, Inc., whose identity is unknown to Plaintiff upon reasonable investigation, and who goes by the online pseudonym “Plutocow.”

7. The Court has personal jurisdiction over the Defendants by virtue of their continuous and systematic business contacts with New Mexico, and because the events and transactions subject of this Complaint occurred in New Mexico.

8. Plaintiff invokes the Court’s subject matter jurisdiction pursuant to 28 U.S.C. § 1332, because the matter in controversy exceeds the sum or value of \$75,000, exclusive of costs and interest, and because no Defendant is a resident of the same state as the Plaintiff.

9. Venue is proper before the Court.

GENERAL ALLEGATIONS

I. RATIONALWIKI FOUNDATION, INC. IS AN INFORMATION CONTENT PROVIDER

10. Under 47 U.S.C. § 230, an “interactive computer service” is afforded certain protections from civil liability. However, Section 230 distinguishes between an “interactive computer service,” and an “information content provider,” which does not enjoy such protections.

11. Section 230 defines an “interactive computer service” as “any information service, system, or access software provider that provides or enables computer access by multiple users to a computer server...” 47 U.S.C. 230(f)(2).

12. Section 230 defines an “information content provider” as “any person or entity that is responsible, in whole or in part, for the creation or development of information provided through the internet or any other interactive computer service.” 47 U.S.C. 230(f)(3).

13. Defendant RationalWiki Foundation, Inc. (“RWF”) is an information content provider.

14. RWF publishes, maintains and operates a website, at <https://rationalwiki.org> (the website, hereinafter referred to as, “RationalWiki”).

15. RWF was incorporated in 2011 by Defendant Trent Toulouse, a resident of New Mexico.

16. Since 2011, Toulouse has served continuously as both a Board Trustee, and Operations Manager, of RWF.

17. The Operations Manager within RWF functions as an executive officer.

18. As Operations Manager, Toulouse has the sole ability to alter settings and create functions and extensions on the website server.

19. The website server is, and at all times relevant was, located in New Mexico.

20. The website server is, and at all times relevant was, operated from New Mexico.

21. Toulouse has operated and managed RationalWiki—the website—from New Mexico continuously, since at least 2011, until the present.

22. New Mexico is the principal geographic locus of RWF’s and RationalWiki’s operations.

23. RWF is governed by a Board of Trustees. Other than Toulouse, and an individual named David Gerard, all past and current Trustees use pseudonyms on RationalWiki.

24. Since 2011, only twenty-seven individuals have ever served as Trustees of RWF.

25. RationalWiki has over 8,000 discrete articles and millions of unique monthly visitors.

26. RationalWiki's "Community Standards" page was created and heavily edited by Defendant Toulouse, and has been edited by Defendants Will and Does 1 and 2 within the last three years.

27. The page states, *inter alia*, that: (i) RationalWiki articles should take a "snarky" (meaning, snide or derisive) tone; that (ii) RationalWiki has a "scientific point of view," meaning that "our articles take the side of the scientific consensus on an issue"; and that (iii) all content on RationalWiki must conform to the "RationalWiki Mission."

28. The "RationalWiki Mission" page, in turn, states, *inter alia*, that:

The RationalWiki Mission is:

1. Analyzing and refuting pseudoscience and the anti-science movement;
2. Documenting the full range of crank ideas;
3. Explorations of authoritarianism and fundamentalism.
4. Analysis and criticism of how these subjects are handled in the media.

We also have a fifth, unofficial purpose, which is to provide people who agree with the previously-stated goals a place to just hang out and have fun with like-minded people.

RationalWiki is not a general encyclopedia; it does not require articles on every known subject. However, the wiki's mainspace welcomes many articles that do not relate to the primary missions of RationalWiki providing that they are factually accurate and of interest to the community at large. These include articles on general science, historical events and important individuals throughout the world.

29. Various other policy pages on RationalWiki explicate and clarify this viewpoint further. For example, each of the six underlined words in the above-quoted portion of the RationalWiki Mission denotes a hyperlink, which opens a separate page containing an article on that topic, i.e., on "pseudoscience," "authoritarianism," etc. These articles further define what is meant by those terms as they are used in the RationalWiki Mission statement and throughout RationalWiki.

30. RationalWiki holds its content out as scientifically authoritative, and objective truth.

31. For example, a fundraiser banner that has appeared at the top of every page on RationalWiki since late 2024 reads, in part,

Fighting pseudoscience isn't free... We are... hundreds of volunteers who document pseudoscience and crankery around the world every day... [W]e believe we play an important role in defending truth and objectivity.

32. This banner links to a “Fundraiser” page that was created by Defendant Toulouse and has been edited within the last year by Defendant Will, and that contains the same statements.

33. RationalWiki claims that anyone with access to the internet can “edit” (i.e., alter or contribute to the content of) the website, by authoring or editing the articles that appear there, in the nature of an interactive computer platform as defined under 47 U.S.C. § 230(f)(2).

34. This is not true in practice.

35. A very particular, highly ideologized, and readily identifiable left-liberal view of what is rational, what constitutes legitimate science, and what constitutes scientific consensus, pervades all of RationalWiki’s articles, with virtually no variation.

36. Editors’ contributions that contravene this viewpoint, or the RationalWiki Mission, are quickly removed from RationalWiki by a core of specialized editors, which includes Defendants Toulouse, Will, and Does 1-2.

37. This core of specialized editors actively, regularly, and aggressively enforces RationalWiki’s Mission and viewpoint. Articles that are not “on mission” are deleted or altered, edits that are not “on mission” are quickly reverted, and editors who do not uphold the Mission are blocked from contributing.

38. This core of specialized editors includes sysops, techs, and moderators. Most editors (including techs, moderators and sysops) are anonymous, and use pseudonyms on the website.

39. Of these specialized editors, sysops are the lowest-ranking. There are approximately 1500 pseudonymous usernames listed as sysops on RationalWiki, though the true number of active individual sysops is lower than 200 individuals.

40. A page on RationalWiki titled, “Sysop guide” sets forth requirements that sysops must follow, including, “Checking edits by unknown contributors for untruth,” and “to collaborate with others to further RationalWiki’s mission.” The underlined term denotes a hyperlink to the “RationalWiki Mission” page.

41. Techs, moderators, and sysops have authority to alter, block and censor content created by rank-and-file editors, in order to enforce the “Mission.”

42. Techs and moderators have more extensive authority to block and censor than sysops and other editors do.

43. Techs and moderators are the highest-ranking editors of RationalWiki. There are only fifteen techs, seven of whom, including Defendants Will, Toulouse, and Doe 2, are current and/or past RWF Board Trustees. There are only six moderators (three of whom, including Defendant Doe 1, are current and/or past RWF Board Trustees).

44. Extensive canvassing of the articles on RationalWiki reveals that virtually all of the articles appearing there have been edited by one or more techs, one or more moderators, and one or more past or current Board Trustees, and that Defendants Toulouse, Will, and Does 1 and 2 have each edited thousands of articles and regularly confer, in various open chat pages, about what content to publish, alter, or censor.

45. RationalWiki’s Mission and viewpoint of what constitutes legitimate science are so rigid, ideologized and dogmatic that, e.g., an article on the website, about the world-renown (and thoroughly mainstream) physicist and popular author Michio Kaku describes Kaku as “a crank”

who has “unorthodox views,” and compares Kaku to notorious conspiracy theorist David Icke (who has only a high school education and is famous for propounding his belief on social media that world leaders are “lizard people,” i.e., shape-shifting reptiles from another dimension.)

46. No particular background, knowledge, training, or credential—academic, scientific, or otherwise—is required to be an editor, sysop, tech, moderator, or Trustee of RationalWiki. The only requirements to “edit” (i.e., to create or alter content) are to adhere to RationalWiki’s Mission and uphold its point of view, to adhere to various non-ideological behavior rules and procedures for decision-making, and submit to oversight by higher ranking editors.

47. An article created by Toulouse in 2011, titled “Legal FAQ,” has appeared on RationalWiki continuously since that time. It describes RationalWiki as a “content producer.” This article was created by Toulouse and has been heavily edited by Toulouse, by current tech David Gerard, as well as by Defendant Will.

48. Individuals who are the subject of laudatory articles on RationalWiki are those whose views conform to the RationalWiki point of view. However, consistent with RationalWiki’s Mission of “fighting [so-called] pseudoscience,” most articles about individuals on RationalWiki are disparaging and accuse the subjects of being cranks, fascists, anti-science or pseudoscientists.

49. When a disparaging article about an individual appears on RationalWiki, this suggests that the person who is the subject of the article is a crank, a fascist, or a pseudoscientist.

II. DEFENDANTS ARE DEFAMING PLAINTIFF

50. Plaintiff Michael Woodley of Menie is an ecologist who has a B.S. from Columbia, and a Ph.D. from Royal Holloway, University of London. Dr. Woodley was a research Fellow of the Center Leo Apostel, an interdisciplinary research department of Vrije Universiteit Brussel, from 2013-2022.

51. Dr. Woodley has authored 172 scholarly publications. Most of Dr. Woodley’s scholarly articles are peer-reviewed and 54% are published in Q1 scientific journals.¹ Dr. Woodley’s public Google Scholar profile shows that he has an h-index of 38 after nineteen years of publishing.²

52. Plaintiff is not a public figure.

53. In 2021, a Wikipedia page about Plaintiff was removed, on notability grounds.

54. RationalWiki contains an article titled “Michael A. Woodley of Menie.” The article was published in 2018 and has been edited within the last three years by Defendants Will and Doe 2. Dozens of anonymous users have contributed “edits” to the article under pseudonyms.

55. The article portrays Dr. Woodley as a white nationalist and a pseudoscientist whose work inspired a mass shooting.

56. The article is false because Dr. Woodley is not a white nationalist or a pseudoscientist, and his work did not inspire a mass shooting.

a. The Shooter Manifesto

57. On May 14, 2022, ten African-Americans were brutally murdered in a mass shooting at a supermarket in Buffalo, New York. The shooter was later identified as Payton Gendron, an 18-year-old with no more than a high school education.

58. Two days before the massacre, Gendron publicly posted a rambling, 180-page, racist and antisemitic manifesto to Google Docs (“the manifesto.”)

59. At unnumbered page 17 of the manifesto, Gendron either copied-and-pasted, or otherwise reproduced without alteration, an infographic (“the infographic”).

¹ Q-score is an index of a scholarly journal’s impact, with Q1 being the top 25% of journals in their domain.

² h-index is a measure of a scientist’s personal impact in their field. An h-index of 20 after 20 years of publishing are considered excellent and make a scientist competitive for tenure-track positions.

60. The infographic was not created by Gendron, but had been circulating on the internet since at least 2016.³

61. Beneath a heading that reads, “THE TRUTH ABOUT RACE,” the infographic displays, side-by-side, three vertical rows of PowerPoint slides, which together contain a total of eight slides. Seven of these eight slides contain graphs and text (and one contains only text) purporting to establish that race is a real biological category and not a social construct.

62. Most of the text contained in the infographic is so small that, when viewing it on a computer screen, it can only be made legible by enlarging the infographic to three or four times the size it appears in the manifesto. When printed on an 8”x11” piece of paper, a magnifying glass is needed to read most of the text it contains.

63. In total, the infographic contains twenty-four citations to scholarly articles, all of them in the smallest size of text that appears in the infographic.

64. The sixth of the eight PowerPoint slides that appear in the infographic contains citations—in tiny, illegible print—to two separate scholarly articles. One of these is a paper that was published by Dr. Woodley in 2010, titled “Is *Homo Sapiens* polytypic?”

65. Prior to the Buffalo shooting, Dr. Woodley first saw a variant of the infographic, after it was posted to a racist website. Out of a sense of social responsibility (to prevent his work from being misused to promote racism), Dr. Woodley emailed the proprietor of the website, and demanded that all reference to his work be removed from the website.

66. In addition to the infographic, the manifesto also reproduces dozens of memes, other infographics, political comics, and screenshots from various websites, online message boards, and news items. All of these appear to be reproduced without alteration.

³ See, Carlson J, Henn BM, Al-Hindi DR, Ramachandran S. Counter the weaponization of genetics research by extremists. *Nature*. 2022 Oct;610(7932):444-447. doi: 10.1038/d41586-022-03252-z. PMID: 36261568.

67. It is clear from the manifesto that Gendron's familiarity with the topics he addresses therein (e.g., race, finance, the Talmud, etc.) is superficial at best.

68. The only place in the manifesto where Dr. Woodley's name or any reference to his work appears, is in the infographic. No portion of the manifesto that was actually authored by Payton Gendron mentions Dr. Woodley or his work at all, anywhere.

69. There is no evidence that Gendron ever read the article by Dr. Woodley that is cited in the infographic.

70. There is no evidence that Gendron, at the time he authored the manifesto, was even aware of Dr. Woodley or had ever read anything Dr. Woodley had published.

71. The infographic contains citations to twenty-three other scholarly papers, with each citation in tiny, illegible print that has to be enlarged in order to be read.

72. There is no evidence that Gendron ever actually read any of these twenty-four papers or was at all familiar with their contents, their authors, or their authors' work.

73. The RationalWiki article about Dr. Woodley states that,

In June 2022, it was revealed that white supremacist Payton S. Gendron, the perpetrator of the 2022 Buffalo shooting is fond of Menie's racist research and cited him in his 180-page terrorist manifesto.

74. Gendron did not actually "cite" Dr. Woodley in the manifesto.

75. There is absolutely no evidence that Gendron "is fond of" Dr. Woodley's research.

76. The statement that Gendron "is fond of" Dr. Woodley's research is absolutely false and invidious.

77. The statement that Gendron "is fond of" Dr. Woodley's research "and cited him in his 180-page terrorist manifesto" strongly implies that Dr. Woodley helped inspire the massacre.

78. That implication is absolutely false and invidious.

79. Directly beneath the infographic on unnumbered pages 17-18 of the manifesto, a passage appears, this one actually authored by Gendron (unlike the infographic). It reads, “Below are more sources about genetics and intelligence.”

80. Beneath this passage, a litany of citations to articles in other publications appears, with hyperlinks. Among these publications are the prestigious journals *Nature*, *Current Directions in Psychological Science*, and *Twin Research and Human Genetics* (published by Cambridge University Press), as well as *The New York Times*.

81. Based on Gendron’s education level and use of language in the manifesto, it appears that Gendron had no more than a very superficial familiarity, if any, with these sources.

82. Based only on these citations, it is unfounded to say that the shooter, “is fond of” or particularly familiar with *any* of those publications; and it is equally unfounded of RationalWiki to say that Gendron “is fond of” Dr. Woodley’s work.

83. Elsewhere in the RationalWiki article about Dr. Woodley, it states,

Specifically, Gendron on page 17 of his manifesto had relied on a table made by Woodley arguing there is enough genetic diversity between human populations to recognise subspecies (races) when compared to jaguars, leopards, chimpanzees, pumas and elk. Gendron, however, posted a simplified form of Woodley’s table (citing his study underneath).

84. Gendron did not “rel[y] on a table made by Woodley,” because the table referred to, that appears in the infographic, was not made by Dr. Woodley and does not appear in any work he has ever published.

85. The statement that “Gendron... relied on a table made by Woodley” falsely implies that Gendron’s manifesto made use of Dr. Woodley’s work in a substantive way.

86. The statement that “Gendron... posted a simplified form of Woodley’s table (citing his study underneath)” falsely implies, without evidence, that Gendron’s manifesto included a form of a table made by Dr. Woodley, that was “simplified” by Dr. Woodley.

87. The statement that “Gendron... posted a simplified form of Woodley’s table (citing his study underneath)” falsely implies, without evidence, that Gendron manually (and faithfully or accurately) simplified a table made by Woodley after consulting Woodley’s work.

88. The statement that Gendron “cited [Woodley’s] study” falsely implies that a citation contained in the manifesto was composed by Gendron upon consulting Woodley’s work.

89. The truth is that all Gendron actually did was copy-and-paste a scarcely-legible infographic that he did not create—containing an illegible table Dr. Woodley had not created, and a scarcely-legible citation to an article Gendron had not read.

b. RationalWiki Invidiously Mischaracterizes Dr. Woodley’s Work and Views

90. The RationalWiki article about Dr. Woodley further states,

In 2010, Woodley published a paper arguing human races are biological as opposed to social constructs – “Is *Homo sapiens* polytypic? Human taxonomic diversity and its implications”... Not surprisingly, the only websites to support the conclusions of this paper are white nationalist ones...

91. The statement that “the only websites to support the conclusions of this paper are white nationalist ones” is false. The paper has been cited thirty times in scholarly publications, most of which are available online and all of which are listed on Dr. Woodley’s publicly accessible Google Scholar profile, which appears in the top five Google search results for his name.

92. Referring to the 2010 paper (titled “Is *Homo Sapiens* polytypic?”) the RationalWiki article about Dr. Woodley further states that, “Woodley’s controversial views on race are disputed by most population geneticists.”

93. No citation is provided to substantiate this statement. Dr. Woodley’s “views on race” have not been addressed, much less disputed, by “most population geneticists.”

94. The statement mischaracterizes Dr. Woodley’s views on race, which he has revised in publicly-available scholarly work published after 2010.

95. For example, a 2020 paper co-authored by Dr. Woodley (and linked directly from his publicly available Google Scholar profile for the past five years) treats race as socially constructed and concludes that race is of low salience as a psychological “alliance cue.”⁴

96. To the extent it refers to the views expressed in Dr. Woodley’s 2010 paper (“*Is Homo Sapiens polytypic?*”), the statement that, “Woodley’s controversial views on race are disputed by most population geneticists” misstates the prevailing view of race among population geneticists.

97. A 2018 study found that,

Through a qualitative content analysis of free-text comments from 515 survey respondents, we identified key themes pertaining to multiple meanings of race, the use of race as a proxy for genetic ancestry, and the relevance of race and ancestry to health. Our findings suggest that for many genetics professionals the questions of what race is and what race means remain both professionally and personally contentious... While there may be consensus in the scientific community that socially defined races are not discrete taxonomic, biological, or genetic groups, disagreements remain about whether and to what extent race is a useful proxy for genetic or other biological differences between individuals.⁵

98. Harvard professor David Reich is a world-renown population geneticist, a bestselling popular author, and among the world’s leading authorities on the subject of population genetics, if not *the* leading authority in the world today.

99. In a March 2018 op-ed published in *The New York Times*,⁶ Dr. Reich wrote that,

⁴ Woodley of Menie, M.A., Heeney, M.D., Peñaherrera-Aguirre, M., Sarraf, M.A., Banner, R., & Rindermann, H. (2020). A meta-analysis of the ‘erasing race’ effect in the U.S., and some theoretical considerations. *Frontiers in Psychology*. 11, 1635.

⁵ Nelson SC, Yu JH, Wagner JK, Harrell TM, Royal CD, Bamshad MJ. A content analysis of the views of genetics professionals on race, ancestry, and genetics. *AJOB Empir Bioeth*. 2018 Oct-Dec;9(4):222-234. doi: 10.1080/23294515.2018.1544177. Epub 2019 Jan 4. PMID: 30608210; PMCID: PMC6516754.

⁶ <https://www.nytimes.com/2018/03/23/opinion/sunday/genetics-race.html>

...over the years this consensus [that race is a social construct] has morphed, seemingly without questioning, into an orthodoxy. The orthodoxy maintains that the average genetic differences among people grouped according to today's racial terms are so trivial when it comes to any meaningful biological traits that those differences can be ignored... I have deep sympathy for the concern that genetic discoveries could be misused to justify racism. But as a geneticist I also know that it is simply no longer possible to ignore average genetic differences among 'races.' Groundbreaking advances in DNA sequencing technology have been made over the last two decades... With the help of these tools, we are learning that while race may be a social construct, differences in genetic ancestry that happen to correlate to many of today's racial constructs are real. Recent genetic studies have demonstrated differences across populations not just in the genetic determinants of simple traits such as skin color, but also in more complex traits like bodily dimensions and susceptibility to diseases. I am worried that well-meaning people who deny the possibility of substantial biological differences among human populations are digging themselves into an indefensible position... that will not survive the onslaught of science.

100. Elsewhere in the RationalWiki article about Dr. Woodley, it states that,

In 2018, Michael A. Woodley with Edward Dutton published *At Our Wits' End: Why We're Becoming Less Intelligent and What it Means for the Future* that argues human intelligence has gone into rapid decline since the Industrial Revolution. This sort of pseudoscientific work on dysgenics is popular among the alt-right...

101. *At Our Wit's End* is readily available online (including for free, on the Web Archive, since May 2021⁷) and contains 431 citations, the majority to scholarly, scientific articles in peer-reviewed journals. It was published by Imprint Academic, an ideologically neutral, mainstream academic press in the U.K., and was reviewed favorably in *Evolutionary Behavioral Sciences*, a journal of the American Psychological Association.

102. *At Our Wit's End* is not a "pseudoscientific work."

103. In the RationalWiki article about Dr. Woodley, at the bottom of the page, a list of "categories" appears, which Dr. Woodley purportedly belongs in. These categories include "Racism," "Alt-right," "Eugenics supporters," "Pseudoscience promoters," "Racialism pseudoscientists," "Racists," and "Sexists." Each of the "categories" in the list is hyperlinked to another page on RationalWiki which lists individuals who purportedly belong in that category.

⁷ <https://archive.org/details/societas-edward-dutton-michael-a.-woodley-of-menie-yr.-at-our-wits-end-why-were->

104. By categorizing Dr. Woodley as a “Pseudoscience promoter,” Defendants are calling Dr. Woodley a pseudoscientist.

105. At the top of the “Categories:Pseudoscience promoters” page where Dr. Woodley is listed, a conspicuous, highlighted note appears in bold font, which reads, “This category is for individuals... that promote pseudoscience.” The underlined word denotes a hyperlink which links to an article titled, “Pseudoscience.” That article has been edited within the last three years by Defendants Will and Does 1-2, and defines “pseudoscience” as follows:

Pseudoscience describes any belief system or methodology which tries to gain legitimacy by wearing the trappings of science but fails to abide by the rigorous methodology and standards of evidence that are the marks of true science. Promoters of pseudoscience often adopt scientific vocabulary, describing conjectures as hypotheses, theories, or laws, providing “evidence” from observation and “expert” testimonies, or even developing what appear to be mathematical models of their ideas. However, in pseudoscience, there is no honest attempt to follow the scientific method, provide falsifiable predictions, or develop double-blind experiments. Although pseudoscience is designed to appear scientific, it lacks all of the substance of science.

106. By defining “pseudoscience” this way, categorizing Dr. Woodley under “pseudoscience promoters,” and listing Dr. Woodley on the “Categories:Pseudoscience promoters” page, Defendants assert that Dr. Woodley is a pseudoscientist to whom that definition applies.

107. That definition does not apply to Dr. Woodley.

108. Defendants have no basis for calling Dr. Woodley a “pseudoscientist” or a “pseudoscience promoter.”

109. Dr. Woodley is a credentialed scientist with an h-index of 38, who has authored 172 scholarly articles, the majority peer-reviewed and published in Q1 journals. His scholarly work has been cited over 3900 times by other scientists.

110. Defendants, on the other hand, have no known academic credentials or scientific bona fides, other than, potentially, Defendant Will (who purports on LinkedIn to have earned a B.S. in

computer science after seven years at the University of Maryland) and Defendant Toulouse—who teaches at a community college, is listed as a co-author of only five scholarly publications over his entire career, and whose work is of such low impact that he does not even have an h-index or a profile on ResearchGate or Google Scholar.

111. At the top of the “Categories:Racism” page where Dr. Woodley is listed, a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Racism.*” The underlined word denotes a hyperlink which links to an article titled “Racism.” That article has been edited within the last three years by Defendants Will and Doe 2, and defines “racism” as follows:

Racism is the belief that humans can be meaningfully defined into biological ethnic categories in order to separate supposed superior from inferior races and/or generally showing discrimination or hostility against a person(s) on the basis of their race. It is based upon the irrational belief that superficial differences among races ‘determine cultural or individual achievement.’ Racism manifests in negative discrimination based upon race in a particular culture.

112. By defining “racism” this way, categorizing Dr. Woodley under “Racism,” and listing Dr. Woodley on the “Categories:Racism” page, Defendants assert that Dr. Woodley is a racist to whom that definition applies.

113. That definition does not apply to Dr. Woodley. Dr. Woodley has never argued for “superior [and] inferior races,” for “discrimination or hostility against a person on the basis of their race,” or for “the irrational belief that superficial differences among races determine... individual achievement,” nor has he ever engaged in “negative discrimination based upon race.”

114. At the top of the “Categories:Eugenics supporters” page, which has been edited within the last three years by Defendant Doe 2, and where Dr. Woodley is listed along with Adolf Hitler, a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Eugenics.*” The underlined word denotes a hyperlink which links to an article titled

“Eugenics.” That article has been edited within the last three years by Defendants Will, and Does 1-2, and defines “eugenics” as,

the purported study of applying the principles of artificial selection and selective breeding through altering human reproduction with the goal of changing the relative frequency of traits in a human population.

115. By defining “eugenics” this way, and categorizing Dr. Woodley under “Eugenics supporters,” Defendants assert that that definition applies to Dr. Woodley.

116. That definition does not apply to Dr. Woodley.

117. By defining “eugenics” this way, and categorizing Dr. Woodley under “Eugenics supporters,” along with Adolf Hitler, the RationalWiki article about Dr. Woodley badly mischaracterizes his views.

118. In 2020, Dr. Woodley co-authored a book chapter featured in *Ideological and Political Bias in Psychology*, that was eventually brought to print in 2023 by Springer, the prestigious scientific publishing house.

119. The chapter (Ch. 25) is titled, “Controversies in Differential Psychology and Behavior Genetics: A Sociological Analysis.” That chapter states, in part, that,

none of us endorses eugenics, even in its non-coercive forms... [A]mong the policies that we do *strongly oppose* are those aimed at removing reproductive freedoms from people deemed (by eugenicists) to have socially undesirable traits.

(Emphasis in the original).

120. Also, this year, Dr. Woodley authored a popular science article which stridently opposes eugenics.⁸

121. The RationalWiki article on “Eugenics” goes on to state that,

⁸ Woodley of Menie, M.A. 2025. Die Moderne Eugenik Könnte Unz Ins Verberden Stürzen (Modern Eugenics Could Destroy Us All). *Schweizer Monat*. 1117, pp. 24-26.

Most eugenicists believe that the goal of humanity is to achieve racial purity and exterminate people they deem not racially pure [through] abortion, forced sterilization, and mass murder.

122. Because RationalWiki characterizes “eugenicists” in this manner, by categorizing Dr. Woodley alongside Adolf Hitler as a “eugenics supporter” at the same time that it categorizes Dr. Woodley as a racist and “alt-right,” the article about Dr. Woodley strongly implies that this characterization (i.e., “belie[f] that the goal of humanity is to achieve racial purity and exterminate people....” etc.) applies to Dr. Woodley.

123. That highly invidious characterization does not apply to Dr. Woodley.

124. Under a heading labelled, “Sexism,” the RationalWiki article about Dr. Woodley states,

Woodley co-wrote a paper at the London Conference on Intelligence with Meisenberg that was overtly sexist, arguing: ‘Neither economic development nor the progress of female emancipation or empowerment have been successful at virilizing female achievement levels.’

125. No citation is provided to support this statement.

126. The purported quote was never stated by Dr. Woodley.

127. The quote is a description of the gender equality paradox, a well-known phenomenon that is a matter of consensus in the social sciences. It is not “sexist.”

128. The only paper Dr. Woodley co-authored with Meisenberg on the topic of sex differences was not “co-wr[itten] at the London Conference on Intelligence.” Rather, it was published in *The Journal of Happiness Studies*, a Springer publication and one of the most oft-cited and ideologically anodyne science journals.⁹

129. The paper is linked from Dr. Woodley’s publicly-available Google Scholar profile, which shows it has been cited over 250 times by other scholars.

⁹ Meisenberg, G., Woodley, M.A. Gender Differences in Subjective Well-Being and Their Relationships with Gender Equality. *J Happiness Stud.* 16, 1539–1555 (2015). <https://doi.org/10.1007/s10902-014-9577-5>

130. The paper is not “sexist.”

131. At the top of the “Categories:Sexists” page where Dr. Woodley is listed (along with Adolf Hitler and Vladimir Putin), a conspicuous, highlighted note appears in bold font, which reads, “*See the main article for this category, Sexism.*” The underlined word denotes a hyperlink which links to an article titled “Sexism.” That article defines “sexism” as “discrimination against people due to their perceived gender, biological sex, or both.”

132. By defining “sexism” this way, and categorizing Dr. Woodley under “sexists,” Defendants assert that Dr. Woodley is a sexist to whom that definition applies.

133. That definition does not apply to Dr. Woodley.

134. Dr. Woodley has never “discriminat[ed] against people due to their perceived gender, biological sex, or both,” nor advocated for any such discrimination, and there is no evidence that he has ever done so.

III. DR. WOODLEY IS BEING DAMAGED

135. The “Michael A. Woodley of Menie” article was published on RationalWiki in 2018, and has remained published and viewable on the website since that time.

136. For at least the past three years until the present, the article has continuously ranked at the top of the first page of Google search results for Dr. Woodley’s name.

137. Defendants are aware that RationalWiki’s “page rank” on Google is abnormally high, and that, as a result, when they publish disparaging articles like the one about Dr. Woodley, this is likely to cause considerable reputational damage to the subjects and targets of that content, and is likely to discourage third parties from dealing with the individuals targeted.

138. Because the article ranks on the first page of Google search results for Dr. Woodley's name, Dr. Woodley's colleagues and potential business associates see the article when they search for Dr. Woodley on Google.

139. Due to RationalWiki's claims of scientific objectivity, and its resemblance to Wikipedia, the website appears authoritative, thus discouraging others from dealing with Dr. Woodley.

140. Its high rank in Google search results, alone, is enough to raise reputational concerns serious enough to discourage others from dealing with Dr. Woodley.

141. These factors, coupled with the website's characterization of Dr. Woodley as a racist, a eugenicist, a white nationalist, a sexist, and a pseudoscientist—alongside highly particularized and deeply stigmatizing definitions of those terms—are humiliating and stressful to Dr. Woodley, and discourage others from dealing with him.

142. The RationalWiki article about Dr. Woodley has been seen by numerous colleagues and potential business associates and caused them to refrain from dealing with Dr. Woodley.

143. Numerous colleagues to whom Dr. Woodley has proposed collaborations have refrained from collaborating with Dr. Woodley upon exposure to the RationalWiki article about him.

144. In 2023, one colleague with whom Dr. Woodley had agreed to collaborate abruptly ended the collaboration, upon exposure to the RationalWiki article about Dr. Woodley.

145. Dr. Woodley has diverted considerable time and energy away from his personal and business pursuits, attempting to have the article's rank lowered in Google search results.

146. Since 2021, Dr. Woodley has spent approximately \$80,000.00 on SEO services in an effort to suppress the RationalWiki article about him from Google search results.

147. One editor has expressed, to Dr. Woodley, hesitation to publish his work, as a direct result of the RationalWiki article connecting Dr. Woodley to the Buffalo atrocities.

148. Since 2018 there has been a dramatic decrease in the previously high rate of citations to Dr. Woodley's work, as a direct result of the RationalWiki article about him.

149. In June 2022, less than one month after the Buffalo shooting, Dr. Woodley became the subject of media hit pieces invidiously associating him with the shooting—including, ironically, in one publication that was directly cited by the shooter in the manifesto (as opposed to being cited in small-print in an infographic the shooter had merely reproduced).

150. This invidious publicity was incredibly painful and emotionally devastating for Dr. Woodley, and as a result he was hospitalized for depression.

151. That same month, the RationalWiki article about Dr. Woodley was edited, including by Defendants Will and Doe 2, to address the massacre and the appearance of Dr. Woodley's name in the shooter's manifesto.

152. As of June 9, 2022, and at all times since then, the third paragraph at the very top of the article reads,

In 2022, it was revealed that white supremacist Payton S. Gendron the perpetrator of the Buffalo shooting is fond of Menie's racist research and cited him in his controversial 180-page manifesto.

153. As a direct result of the RationalWiki article, Dr. Woodley has not worked in academia since June 2022.

154. The RationalWiki article about Dr. Woodley and its prominent ranking in Google search results continue to stigmatize him, prevent others from dealing with him, and emotionally traumatize Dr. Woodley.

ENUMERATED CAUSES OF ACTION

WHEREFORE the Plaintiff, MICHAEL WOODLEY of MENIE, Ph.D., as a direct and proximate result of Defendants' misconduct, has been damaged, and hereby pleads the following causes of action against Defendants, whom he seeks to hold liable:

COUNT I
Defamation
Against All Defendants

155. Plaintiff incorporates by reference all preceding paragraphs.

156. Defendants published false statements of fact about Plaintiff to third parties.

157. Defendants published aforesaid false statements without privilege.

158. Aforesaid third parties understood the false statements to have defamatory meaning.

159. Defendants published the false statements while knowing they are false.

160. Defendants published the false statements with reckless disregard for the truth.

161. Defendants' defamation is wanton and willful.

162. Defendants published the false statements negligently.

163. As a direct and proximate result of Defendants' defamation, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT II
Invasion of Privacy: False Light
Against All Defendants

164. Plaintiff incorporates by reference all preceding paragraphs.

165. Defendants published statements about Plaintiff in public fora, attributing false characteristics to Plaintiff.

166. The characteristics which Defendants falsely attributed to Plaintiff are highly offensive to a reasonable person.

167. Defendants intentionally portrayed Plaintiff in a false light before the community.

168. Defendants recklessly portrayed Plaintiff in a false light before the community.

169. Defendants portrayed Plaintiff in a false light without privilege.

170. Defendants' false light invasion of privacy is wanton and willful.

171. As a result of Defendants' false light invasion of privacy, Plaintiff has suffered humiliation, mental anguish, and suffering.

172. As a direct and proximate result of Defendants' false light invasion of privacy, the Plaintiff has been damaged, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT III
Conspiracy
Against All Defendants

173. Plaintiff incorporates by reference all preceding paragraphs.

174. Defendants intentionally agreed to defame Plaintiff

175. Defendants intentionally agreed to violate Plaintiff's privacy.

176. Defendants agreed to defame Plaintiff with knowledge of unlawfulness.

177. Defendants agreed to violate Plaintiff's privacy with knowledge of unlawfulness.

178. One or more Defendants acted overtly in furtherance of each of aforesaid agreements.

179. As a direct and proximate result of Defendants' conspiracy, the Plaintiff has suffered and continues to suffer pecuniary damages and reputational harm, humiliation, mental anguish and suffering, and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

COUNT IV
Prima Facie Tort
Against All Defendants

180. Plaintiff incorporates by reference all preceding paragraphs.

181. Defendants jointly and severally committed intentional acts directed at Plaintiff.

182. Defendants committed aforesaid acts with intent to injure the Plaintiff.

183. Defendants committed aforesaid acts without justification.

184. Aforesaid acts were wanton and willful.

185. Aforesaid intentional acts were otherwise lawful.

186. Plaintiff was damaged as a result of aforesaid acts.

187. As a direct and proximate result of Defendants' prima facie tort, the Plaintiff has been damaged and is entitled to compensatory damages, punitive damages, pre- and post-judgment interest, attorney fees and all costs of bringing this action, and such other and further relief as the Court deems just and equitable.

JURY DEMAND

Plaintiff demands a trial by jury of all issues so triable.

PRAYER FOR RELIEF

WHEREFORE the Plaintiff, MICHAEL WOODLEY of MENIE, Ph.D., hereby respectfully prays the Court's relief, as follows:

- I. Compensatory damages in the amount to be proven at trial.
- II. Punitive damages.
- III. Pre- and post-judgment interest.
- IV. Attorney fees and all costs of bringing this action.
- V. Such other and further relief as the Court deems just and equitable.

Respectfully Submitted,

LATE NIGHT LAW, LLC

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